



SDMS DocID

2075617



January 12, 2006

United States Environmental Protection Agency  
Region 3  
1650 Arch Street  
Philadelphia, PA 19103-2029

RE: Safety Light Corporation Site  
Bloomsburg, Pennsylvania

Dear Sir/Madam:

Attached please find Xerox Corporations response to your inquiry regarding potential shipment of material from Xerox to the Safety Light Corporation Site in Bloomsburg, Pennsylvania.

If you have any questions regarding this response, please do not hesitate to contact me at 585-422-9736.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Stulb", is written over the typed name.

Joseph J. Stulb, P.E.  
Manager, EH&S/Assessment & Remediation

Attachment

Xerox Corporation  
800 Phillips Road, 0205-99F  
Webster, New York 14580  
Telephone 585-422-9736  
Facsimile 585-265-7088

**XEROX RESPONSES TO EPA INFORMATION REQUEST  
RE: SAFETY LIGHT CORPORATION SITE**

In response to EPA's request, Xerox has conducted a records search and made efforts to identify and contact employees potentially possessing knowledge relevant to the subject matter of EPA's request. EPA's request relates to activities conducted up to 40 years ago and longer. Based on this passage of time, no relevant information from documents, employees and former employees has been identified. Xerox reserves the right to supplement this response if responsive information is discovered in the future.

1. Describe in detail the business relationship between Xerox and Safety Light.

At this time, Xerox has been unable to locate any records related to Safety Light, and has been unable to identify any employees with knowledge of any business relationship with Safety Light. Accordingly, Xerox is unable to determine what business relationship, if any, existed between Xerox and Safety Light. The single page ledger record provided by EPA to Xerox along with the EPA's information request includes Xerox's name and a Xerox Webster, New York address, as well as a February 1966 date. Xerox does have business operations at this Webster address. However, the ledger does not provide sufficient detail or clarity to define the specific business relationship, if any, that may have existed.

2. Did Xerox ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?

Xerox has identified no relevant documents or employees with knowledge indicating that Xerox transported or brokered substances or wastes to the Safety Light site either directly or through any of the listed entities. See also response to 1 above.

3. If you answered "yes" to Question 2, please answer the following questions:

N/A, based on response to 2 above.

- a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

- b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.
- c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:
  - i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, isolite);
  - ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;
  - iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;
  - iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
  - v. all personal and internal company documents and correspondence regarding the type and amount of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;
  - vi. the name, title, areas or responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.
- 4. Did Xerox ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

**Xerox has identified no relevant documents or employees with knowledge indicating that Xerox generated wastes that were disposed or reclaimed at the Safety Light site either directly or through any of the listed entities. See also response to 1 above.**

5. If you answered "yes" to Question 4, please address the following issues:

**N/A, based on response to 4 above.**

- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:
  - i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;
  - ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;
  - iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;
  - iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and
  - v. the method of treatment and/or disposal of the above.
- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:
  - i. disposed of or treated radioactive or hazardous materials at the Site; and

- ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and
  - iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.
- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please specify:
- i. the persons with whom you, or other such persons, made such arrangements;
  - ii. every date on which such arrangements took place;
  - iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;
  - iv. the precise locations at which each material was disposed or treated at the Site;
  - v. the persons who selected the Site as the place at which materials were disposed or treated;
  - vi. the final disposition of each material involved in such transactions; and
  - vii. the names of employees, officers, owners, and agents for each transporter.
- d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:
- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

- ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.
  - e. Provide the names, titles, and areas of responsibility of any persons, including all Xerox employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.
  - f. Describe any permits or applications and any correspondence between Xerox and any regulatory agencies regarding materials transported to or disposed of at the Site.
  - g. Provide copies of any correspondence between Xerox and any third party regarding materials transported or disposed of at the Site.
  - h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.
  - i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.
  - j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.
  - k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.
6. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide

additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

**Due to the passage of time since the 1966 date referenced in the ledger page attached to EPA's request, Xerox has been unable to identify any current employees with knowledge responsive to the questions contained herein. It is possible that former/retired Xerox employees may have some knowledge regarding disposal. However, Xerox has been unable to identify the names of any surviving former employees who were employed during the relevant time period and who may have relevant knowledge. Xerox contacted several former employees who were believed to have some possible familiarity with historical disposal practices in general, but neither recalled any Xerox involvement with Safety Light.**

**George Hall-Maintenance Manager – (b) (6)**

**Warren Zimmer-Plant Engineering Manager – (b) (6)**

7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

**Xerox does not have knowledge of the existence of any records or the names of others who may possess such records or who may possess additional information.**

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

**Xerox does not have knowledge of the existence of any records or the names of others who may possess such records or who may possess additional information. Xerox has no knowledge of others who may be responsible for contamination at the site.**

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:
  - a. Your document retention policy;

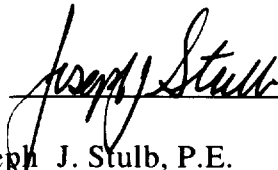


- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

**Xerox has not been able to determine if any documents sought by this request ever existed. Xerox therefore does not know if/when any such documents could have been lost or destroyed.**

Please feel free to contact me if you have any questions.

XEROX CORPORATION

By: \_\_\_\_\_

Joseph J. Stulb, P.E.  
Manager, Environmental Remediation and Assessment

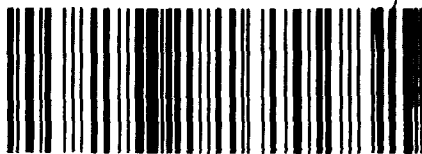
THE DOCUMENT COMPANY

**XEROX**

Xerox Corporation  
800 Phillips Road  
Building 0205-99F  
Webster, NY 14580

Joseph J. Stulb

**CERTIFIED MAIL**



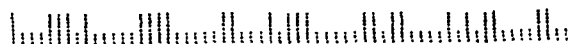
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*LAUREN TANN  
(34562)*

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